REMARKS

Applicants submit that the claims, drawings and disclosure remain unchanged as previously presented.

Applicants note that the Examiner kindly advised Applicants of their duty to comply with 37 CFR 1.56. Accordingly, Applicants submit that all of the claims are commonly owned.

Discussion of "Response to Arguments"

Applicants note that the Examiner made a "Response to Arguments" in the current Office Action addressing to Applicant's arguments filed Jan. 4, 2006, for which courtesy the Examiner is thanked.

However, "[W]here the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it"; and "[T]he examiner must address all arguments which have not already been responded to in the statement of the rejection" (as per MPEP§707.07(f)). Applicants submit that the following arguments made in the previous

response on which the allowability of the present application relies are not answered in the current Office Action.

1. "[A] color separation plate 12 as taught by Blankenbecler '446 is not a color filter at all" (Pages 11-12 of the Amendment dated 1/4/06) , as argued with respect to claims 1, 8 and 16.

2. Blankenbecler fails to teach, suggest or disclose, as per claims 1 and 8, "a color filter comprising a **color layer** ..." (Emphasis added) (Page 12 of the Amendment dated 1/4/06).

3. As diffused light is essentially the antithesis of collimated light, there is no reasonable expectation of success to combine or to modify Kalmanash '463 with a color separation plate, as set forth in Blankenbecler '446 (Pages 12-13 of the Amendment dated 1/4/06).

Applicants respectfully submit that it is critical that the reasoning asserted by the Examiner in determining that each of the foregoing

arguments were not found to be persuasive. Such reasoning is needed for Applicants to further promote prosecution by permitting Applicants to effectively address the Examiner's concerns and to better explain the merits of the claimed invention. Without an oriented understanding about the reasons for which the rejections have been made and have continued to be maintained, the remarks provided hereafter refer to mostly previous arguments and partly rely on subjective speculation toward the Examiner's ideas. The Examiner is invited to kindly give the reasons in a next Office Action, and the Final status of the current Office Action is respectfully requested to be withdrawn.

Claim Rejections - 35 USC §103

Claims 1, 2, 4-9, and 11-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kalmanash (US 5,211,463) in view of Blankenbecler et al. (US 6,104,446).

In response to the rejection of claims 1, 2, 4-9, and 11-17 under 35 U.S.C. 103(a) as being unpatentable over Kalmanash (US 5,211,463) in view of Blankenbecler et al. (US 6,104,446), Applicants traverse this

rejection.

Claim 1 recites in part:

> ... a color filter disposed on and adjacent to the emitting surface, the color filter comprising a color layer for a full color display...

Similarly, claim 8 recites in part:

> ... a color filter disposed on and adjacent to the emitting surface, the color filter comprising a color layer for a full color display...

Likewise, claim 16 recites in part:

> ... a color filter is ... adjacent to the emitting surface of the light guide plate.

Applicants submit that such a light guide plate as set forth in claims 1, 8 and 16, is neither taught, disclosed, nor suggested by Kalmanash '463, Blankenbecler '446, or any of the other cited references, taken alone or in combination.

The Examiner admitted that Kalmanash '463 fails to disclose a color

filter disposed on and adjacent to the emitting surface of the light guide plate. Therefore, the Examiner cites Blankenbecler as a second reference to modify Kalmanash to arrive at the claimed invention.

Blankenbecler '446 does disclose a color separation plate 12. However, a color separation plate 12 as taught by Blankenbecler '446 is not a color filter at all. One of ordinary skill in the art should understand that a color filter obtains R, G, B lights by selectively filtering (absorbing or reflecting) the unwanted bandwidth(s) from the white light. For example, when a white light passes through a color filter or R pixel, the light bandwidths of green and blue are filtered, and only red light is selectively allowed to pass therethrough. As to the color separation plate 12, it **breaks up** white light into its RGB components (Column 10, lines 58 and 59; Emphasis added). In other words, it obtains R, G, B lights by **separating** a white light into three visible components, by use of optical prisms. Therefore, **there is no light filtered at all,** and as such, **the color separation plate 12 is not a color filter,** as set forth in claims 1, 8 and 16 (Emphasis added).

Specifically, further evidence that the color separation plate of

Blankenbecler is not indeed a color filter to those skilled especially in the art of liquid crystal display is given by Sawada US 6,649,952. Sawada is cited as a reference for a subsequent 103 rejection to claims 3 and 10. Sawada teaches "[A]s a color filter for a liquid crystal display device, there are two types, in one of which a color filter is formed on the side of an opposing substrate opposing to a Thin Film Transistor (referred to as 'TFT', hereinafter) substrate and in the other of which a color filter is formed on the side of the TFT substrate" (Column 1, lines 11-16). Sawada further gives three examples of typical color filters, each of which includes a color layer (46, 66, 86) and a black matrix (42, 62, 82) (line 16 of Column 1 to line 5 of Column 2; FIGS. 1-3). Beyond or at least equivalent to the level of ordinary skill in the art, Sawada understood that no other types of color filters are workable without a color layer, at least as used for light guide plates of LCDs.

Since the color separation plate of Blankenbecler is not at all a color filter, it does not read on a color filter that is required by the claimed invention. Therefore, the cited references considered as a whole do not teach all claim limitations as set forth thereby (MPEP §2143.03).

Additionally, Blankenbecler fails to teach, suggest or disclose, as per claims 1 and 8, "a color filter comprising a **color layer** ..." (Emphasis added.). Blankenbecler teaches three distinct sections of specific geometries of the color separating plate 12 (FIGS. 1-5A), none of which are indicated to be a color layer. Further, Applicants submit that none of the three sections has a layer geometry. Therefore, **Blankenbecler fails to teach or suggest a color layer**, as required in claims 1 and 8, **and, thus, fails to overcome the shortcomings** associated with Kalmanash '463 (Emphasis added).

Furthermore, Blankenbecler teaches "a white light source 9 generated **well-collimated** white light ... directed toward the color separation plate 12" (Column 9, lines 34-37; Emphasis added.). One of ordinary skill in the art should understand that the principle of microprisms for color separation is related to the incident direction, and white light incident from a variety of directions results in distorted color lights. Therefore, the white light source 9 should provide well-collimated white light to the color separation plate 12 for color separating, according to the operating principle of the color separation

plate 12 (i.e., microprisms). However, according to Kalmanash '463, the light provided from the front surface 58 of the edgelit panel is to be diffused to promote uniformity (Paragraph 0023), a detail that is essentially affirmed (RE: diffuser 56) by the Examiner at Page 2, last paragraph, of the Final Rejection dated 3/20/06. As **diffused** light is essentially the **antithesis** of **collimated** light, **there is no reasonable expectation of success** (MPEP §2143.02) **to combine or to modify** Kalmanash '463 **with a color separation plate**, as set forth in Blankenbecler '446 (Emphasis added).

According to the reasons discussed above, Applicants submit that the present invention, as set forth in claims 1, 8 and 16, is novel and unobvious over Kalmanash '463, Blankenbecler '446, or any of the other cited references, taken alone or in combination, and thus claims 1, 8, and 16 should be allowable.

Reconsideration and withdrawal of the rejection and allowance of claims 1, 8, and 16 are respectfully requested.

Claims 2 and 4-7 depend from claim 1; claims 9 and 11-15 depend from claim 8; and claim 17 depends from claim 16, and therefore should

also be allowable.

Claims 3 and 10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kalmanash in view of Blankenbecler, and in further view of Sawada (US Patent No. 6,649,952).

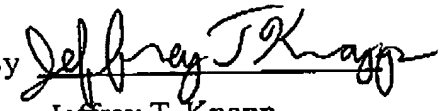
In response hereto, Applicants submit that claims 3 and 10 depend from allowable claims 1 and 8, respectively, and therefore should also be allowable.

Moreover, Applicants submit that there is no reasonable motivation to one of ordinary skill in the art at the time the invention was made to modify the proposed combination of Kalmanash and Blankenbecler to have a light shielding film for shielding UV light of Sawada. The reason of Sawada for providing such a titanium dioxide layer 3 capable of shielding ultraviolet ray is "[O]rganic pigments to be contained in the color layer 6 of the color filter may include phthalocyanine derivatives, anthraquinone derivatives, indigo derivatives, oxazine derivatives and/or perylene derivatives, etc." and "[T]he mechanism of fading may be considered due to decomposition of chromophore caused by active oxygen such as singlet term oxygen or direct decomposition of

chromophore molecular structure caused by ultraviolet ray" (Column 3, lines 38-49). However, the principle of operation of the color separating plate of Blankenbecler is different from that of the color filter of Sawada, and, specifically, the color separating plate of Blankenbecler does not contain any organic pigments. Therefore, since there is no pigment to be degraded by ultraviolet rays, there is no need or motivation for one of ordinary skill in the art to provide such an ultraviolet shielding film on such a color separating plate (MPEP §2143.01) (Emphasis added.).

Respectfully submitted,

Ga-Lane Chen et al

By 

Jeffrey T. Knapp
Registration No.: 45,384
Foxconn International, Inc.
1650 Memorex Drive,
Santa Clara, CA 95050
Tel. No.: 714/626-1229